REMARKS

Claims 1, 3-6, 8-11, 25, 27-31, 34, 35, 38-42 remain pending for consideration. Claims 1, 25, 38 and 40 have been amended to further clarify distinctions between the prior art and the claimed invention.

Rejections Under 35 U.S.C. §102

Claims 1-5, 8-11, 25-29, 31, 34-35, 38-42 stand rejected under 35 U.S.C. §102(e) on the basis that the claims are anticipated by US 6,615,218 (Mandal). Applicants traverse the rejection and submit that there are several limitations within Mandal that are neither taught nor suggested by Mandal. Nonetheless, in an earnest effort to advance prosecution, Applicants have amended independent claims 1, 25, 38 and 40, as discussed further herein, to further clarify distinctions between the pending claims and Mandal.

For convenience, reference is made to claim 1, but the following arguments also apply to independent claims 25, 38 and 40, which include similar limitations. As discussed, there are several limitations in claim 1 that are neither taught not suggested by Mandal. For example, claim 1 recites "receiving a network-condition notification." As recited in claim 1, the network-condition notification is "indicative of a network condition."

The Office Action contends that Mandal teaches a "database storage system [that] listens to commands/network conditions/messages originating from network devices," and the Office Action cites Col. 8, lines 8-12 of Mandal to support this position. Applicants respectfully disagree. For convenience, Col. 8, lines 8-12 are reproduced below. Mandal teaches and claims a database system that includes a data storage medium for storing entries and an indexing structure that locates their entries. But, there is nothing in Col. 8, lines 8-12 that suggests receiving a network condition notification:

> 1. A database system, comprising:
> a data storage medium, for storing entries in the database system;

> an indexing structure that locates entries on the data storage medium....(Mandal, Col. 8, lines 8-12).

Moreover, there is nothing within the teaching of Mandal as a whole that suggests receiving a network-condition notification. At most, Mandal teaches that their user enters commands to specify policies of Mandal's devices:

> First, user 126 inputs commands into GUI 124; these commands specify a high-level policy for controlling actions of devices 130 and 132. For example, a policy may specify that a temperature control system should keep a portion of a building at a certain temperature. Another policy may specify that a network management system should allow no more than 30% of total bandwidth for video traffic. Yet another policy may specify that a network management system should give higher priority to traffic on a LAN that originates from a finance server at the end of a quarter. (Col. 3, lines 51-61).

But, receiving commands from a user to specify policies is very different than receiving a network-condition notification that is indicative of a network condition. Specifically, the commands that Mandal receives from their user specifies policies for their devices—they are neither a network-condition notification nor are they indicative of a network condition. In one embodiment of claim 1 for example, a network-condition notification may indicate an error has occurred (See Applicants' Specification, Para. 33).

Claim 1 also recites determining a response to the network condition notification and retrieving, in response to the determined response to the network condition, a central configuration record from a common repository of configuration records. Although not required, policies may be used to determine the response to the network-condition notification. As set forth in Applicants' Specification with reference to Applicants' FIG. 3 for example,

> if a network condition such as an error occurs, an appropriate message can be published to the event bus 175....To determine the proper response for a message posted to the event bus 175, the received message can be compared against the policies stored in the policy manager 170, which is a repository for the business and network policies and rules used to manage the network.... The defined response can be virtually anything including reconfiguring a network device, shutting down a network device and notifying an administrator (Applicants' Specification, Para. 33 and 34).

Thus, when determining a response to a network-condition notification, stored policies in some embodiments may guide what is ultimately determined to be a proper response. But these stored policies are very different from a configuration record. As recited in claim 1, once a response is determined, a central configuration record corresponding to the network device is retrieved from a common repository of configuration records and modified in accordance with the determined response to the network condition.

As recited in claim 1, at least one device-specific command corresponding to the modified central configuration record is generated and transferred to the network device, and the device-specific command includes at least one instruction to change the local configuration record of the network device such that a modification in the central configuration record is reflected in a modification to the local configuration record, which enables the network device to assist in responding to the network condition.

Applicants submit that Mandal does not teach retrieving and modifying a configuration record for a network device in response to a network-condition notification. The Office Action cites, at Col. 4, lines 35-45, a discussion of Mandal's policy objects 221, 222, 223, 224, 225 and 226. As discussed above, the claimed configuration records are very different from stored policies. But in an earnest effort to clarify the distinction between Applicants' configuration records and Mandal's policy objects, Applicants have amended claim 1 to incorporate the subject matter of claim 2, and in addition, claim 1 has been amended so that the retrieved central configuration record is retrieved from a common repository that includes a plurality of configuration records, each of the plurality of configuration records uniquely representing a local configuration of a corresponding one of the plurality of network devices. Support for this amendment is found, at least, at paragraphs [0012], [0015] and [0037] of Applicants' specification.

In contrast to Mandal's policy objects 221, 222, 223, 224, 225 and 226, each of Applicants' plurality of configurations records is unique to a corresponding network device. More specifically, a single one of Mandal's policy objects 221, 222, 223, 224, 225 and 226 may have multiple ones of Mandal's devices 130, 132 in its policy domain, and the devices that are considered to be within each policy domain vary depending upon

which devices are active (See Mandal, Col. 6, lines 10-20). As a consequence, each of Mandal's policy objects is certainly not unique to one of their devices; thus Mandal's policy objects 221, 222, 223, 224, 225 and 226 can not correspond to Applicants' configuration records.

As a consequence, Applicants submit claim 1 and similarly amended claims 25, 38 and 40 are new and nonobvious, and respectfully request favorable reconsideration. In addition, Applicants submit dependent claims are allowable, at least, by virtue of being dependent from their respective independent claims.

CONCLUSION

In view of the foregoing, Applicants respectfully submit that no further impediments exist to the allowance of this application and, therefore, solicit an indication of allowability. However, the Examiner is requested to call the undersigned if any question or comments arise.

The Commissioner is hereby authorized to charge any appropriate fees under 37 C.F.R. §§1.16, 1.17, and 1.21 that may be required by this paper, and to credit any overpayment, to Deposit Account No. 50-1283.

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